



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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*Frank O'Bannon*  
Governor

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100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

June 30, 2003

TO: Interested Parties / Applicant

RE: **Carrera Designs, Inc.**

**SPM 039-17397-00326**

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

FNTVPMOD.wpd 8/21/02

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVPMOD..wpd 8/21/02



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June 30, 2003

Mr. John Bibbo  
Carrera Designs, Inc.  
4201 Eastland Drive  
Elkhart, IN 46516

Re: **039-17397**  
**First Significant Permit Modification to**  
**Part 70 No.: T 039-7512-00326**

Dear Mr. Bibbo:

Carrera Designs, Inc, formerly Carrera Designs, Inc., Plant 1, was issued Part 70 Operating Permit T 039-7512-00326 on December 31, 1998, for a custom bus and bus skirt (recreational vehicle) coating source. A first Administrative Amendment (039-10677-00326) was issued on April 5, 1999, and a reopening (R039-13217-00326) was issued on November 27, 2001. A letter requesting changes to this permit was received on February 18, 2003. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification, which includes all significant emissions units at this source, is the construction and operation of the following:

- (a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:
  - (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
  - (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs; and
  - (4) One (1) paint mix room.
- (b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:
  - (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;

- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
- (3) One (1) paint mix and storage area.

This modification also includes the following insignificant activities:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (a) Four (4) heaters, identified as H1 through H4, capacity: 0.125 million British thermal units per hour, each.
- (b) One (1) air makeup unit, identified as MA-4, capacity: 2.4 million British thermal units per hour.
- (c) Two (2) air makeup units, identified as MA-2 and MA-3, capacity: 4.8 million British thermal units per hour, each.
- (d) One (1) air makeup unit, identified as MA-1, capacity: 1.375 million British thermal units per hour.
- (e) One (1) hot water heater, identified as B1, capacity: 0.1 million British thermal units per hour.
- (f) Two (2) furnaces, identified as B2 and B3, capacity: 0.09 million British thermal units per hour, each.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised Title V Operating Permit, with all modifications and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 18, or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments  
CAP/MES

cc: File - Elkhart County  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Branch - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner



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## PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR QUALITY

**Carrera Designs, Inc.  
4201 Eastland Drive  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7512-00326	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Quality	Issuance Date: December 31, 1998  Expiration Date: December 31, 2003
First Administrative Amendment 039-10677, issued on April 5, 1999 First Reopening 039-13217, issued on November 27, 2001	
First Significant Permit Modification No.: 039-17397-00326	Conditions Affected: A.1, A.2, All of Section D.1, and the all forms
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>June 30, 2003</b>

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary recreational vehicle coating source.

Responsible Official: John Bibbo  
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
SIC Code: 3711  
County Location: Elkhart  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:
- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
  - (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control; and
  - (4) One (1) paint mix room.
- (b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:
- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
  - (3) One (1) paint mix and storage area.



A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- 
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015



(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for

changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]  
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAQ, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1**     Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2**     Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a)     Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b)     Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3**     Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**C.4**     Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5**     Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6**     Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7**     Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a)     Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within 180 days from the date on which this source commences operation of Plant 2.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible



official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]  
[326 IAC 1-6]

- 
- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6] [326 IAC 2-7-19 (e)]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
  - (1) Indicate actual emissions of criteria pollutants from the source;
  - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;

- (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

**C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and

emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:
- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
  - (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control; and
  - (4) One (1) paint mix room.
- (b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:
- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
  - (3) One (1) paint mix and storage area.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the PM from the painting operations at Plant 1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), BACT for these facilities (EU-01 and EU-02) has been determined to be as follows:

- (a) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC content of coatings used shall be limited as follows:

- (1) primer: 6.1 lbs VOC/ gallon of coating
  - (2) base coat: 5.9 lbs VOC/ gallon of coating
  - (3) clear coat: 4.8 lbs VOC/ gallon of coating
- (c) The following best available control technology (BACT) workplace practices shall be implemented:
- (1) All coatings will be applied with high volume, low pressure (HVLV) spray applicators or a spray applicator as efficient or more efficient than a high volume, low pressure spray applicator.
  - (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
  - (3) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
  - (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
  - (5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.
  - (6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.
  - (7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray emitted on the floor and into the air filters.
  - (8) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC usage limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.5 Particulate [326 IAC 6-3-2(d)]**

Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.6 Monitoring**

- 
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, stacks (F1 through F4 and S3 through S13) while one or more of the coating processes is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.7 Record Keeping Requirements**

- 
- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.1.2.
    - (1) The VOC content of each coating material and solvent used.
    - (2) The amount of coating material and solvent used on monthly basis.
      - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
      - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
    - (3) The cleanup solvent usage for each month;
    - (4) The total VOC usage for each month; and
    - (5) The weight of VOCs emitted for each compliance period.
  - (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
  - (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



#### D.1.8 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Carrera Designs, Inc.  
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-7512-00326

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Carrera Designs, Inc.  
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-7512-00326

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)  
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
CThe Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM <sub>10</sub> , SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Carrera Designs, Inc.  
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-7512-00326

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of Each Deviation</b>

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Carrera Designs, Inc.  
Source Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana 46516  
Part 70 Permit No.: T039-7512-00326  
Facility: Coating facilities at Plants 1 and 2 (EU-01 and EU-02)  
Parameter: Total VOC usage  
Limit: 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Significant Source and Permit Modifications to a Part 70 Operating Permit

<b>Source Name:</b>	<b>Carrera Designs, Inc.</b>
<b>Source Location:</b>	<b>4201 Eastland Drive, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3711</b>
<b>Operation Permit No.:</b>	<b>T 039-7512-00326</b>
<b>Significant Source Modification No.:</b>	<b>039-17227-00326</b>
<b>Significant Permit Modification No.:</b>	<b>039-17397-00326</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

On April 30, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Carrera Designs, Inc., had applied for a Significant Source Modification to a Part 70 Operating Permit to construct Plant 2 for all full body coating operations with dry filters as overspray control and to change the operations at Plant 1 to perform slide out panel coating operations. The notice also stated that OAQ proposed to issue a Significant Source Modification and provided information on how the public could review the proposed Significant Source Modification and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Source Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Significant Source Modification to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### **Change 1:**

The Permittee is required to keep records of the monthly VOC usage to document compliance with the VOC usage limit in Condition D.1.2(a). Daily records of VOC usage are not required, because the coating facilities are not subject to any daily VOC usage limitations or VOC content limitations based on daily averages. Therefore, the following correction has been made to Condition D.1.7(a)(4):

#### **D.1.7 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and usage limits established in Condition D.1.2.
- (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on monthly basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each ~~day~~ month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions D.1.5 and D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Change 2:**

As a result of this modification, the potential to emit VOC from this source will be greater than one hundred (100) tons per year. Therefore, an Emergency Reduction Plan is required. The following condition, Condition C.12, Emergency Reduction Plans, has been added to the permit, and the remainder of Section C is renumbered accordingly.

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

**Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):**

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within 180 days from the date on which this source commences operation of Plant 2.  
  
The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for Part 70 Significant Source and Significant Permit Modifications

#### Source Background and Description

<b>Source Name:</b>	<b>Carrera Designs, Inc.</b>
<b>Source Location:</b>	<b>4201 Eastland Drive, Elkhart, Indiana 46516</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3711</b>
<b>Operation Permit No.:</b>	<b>T 039-7512-00326</b>
<b>Operation Permit Issuance Date:</b>	<b>December 31, 1998</b>
<b>Significant Source Modification No.:</b>	<b>039-17227-00326</b>
<b>Significant Permit Modification No.:</b>	<b>039-17397-00326</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

The Office of Air Quality (OAQ) has reviewed a modification application from Carrera Designs, Inc., formerly Carrera Designs, Inc, Plant 1, relating to the construction and operation of the emission units and pollution control devices listed below.

The source is increasing production to 10 recreational vehicles per day. In addition, more full bodies must be coated. As a result, the applicant is proposing to construct Plant 2 for all full body coating operations and change the operations at Plant 1 to perform slide out panel coating operations. The two (2) plants will operate in series and are part of the same source. Due to the changes in operations, the entire potential to emit of the source is re-calculated and all rule applicabilities are addressed in this document. The modification, which includes all significant emissions units at this source, is as follows:

- (a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:
  - (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
  - (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
  - (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control; and
  - (4) One (1) paint mix room.
- (b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:

- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;
- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
- (3) One (1) paint mix and storage area.

This modification also includes the following insignificant activities:

Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

- (a) Four (4) heaters, identified as H1 through H4, capacity: 0.125 million British thermal units per hour, each.
- (b) One (1) air makeup unit, identified as MA-4, capacity: 2.4 million British thermal units per hour.
- (c) Two (2) air makeup units, identified as MA-2 and MA-3, capacity: 4.8 million British thermal units per hour, each.
- (d) One (1) air makeup unit, identified as MA-1, capacity: 1.375 million British thermal units per hour.
- (e) One (1) hot water heater, identified as B1, capacity: 0.1 million British thermal units per hour.
- (f) Two (2) furnaces, identified as B2 and B3, capacity: 0.09 million British thermal units per hour, each.

Existing insignificant emission units include:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour (one (1) air makeup unit, identified as A1, capacity: 1.0 million British thermal units per hour).
- (b) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (c) On-site fire and emergency response training approved by the department.
- (d) Paved roads.

## History

On February 18, 2003, Carrera Designs, Inc. submitted an application to the OAQ requesting to add a surface coating plant and change the operations at the existing plant. Carrera Designs, Inc. was issued a Part 70 permit on December 31, 1998. A first Administrative Amendment (039-10677-00326) was issued on April 5, 1999, and a reopening (R039-13217-00326) was issued on November 27, 2001.

### Source Definition

This custom recreational vehicles coating source company consists of two (2) plants:

- (a) Plant 1 is located at 4201 Eastland Drive, Elkhart, Indiana 46514; and
- (b) Plant 2 is located at 1101 Herman Street, Elkhart, Indiana 46514.

Since the two (2) plants are located on contiguous or adjacent properties, have the same SIC codes, and are owned by one (1) company, they will be considered one (1) source.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
F1	EU-01; Room B	27.0	2.50	16,500	70
F2	EU-01; Room B	27.0	2.50	16,500	70
F3	EU-01; Room B	28.0	1.5	3,100	70
F4	EU-01; Room B	28.0	1.5	3,100	70
F5	EU-01; Room A	28.0	1.5	2,500	70
S1	EU-02; Room A	8.0	5.1	7,500	70
S2	EU-02; Room A	8.0	5.1	7,500	70
S3	EU-02; Room B	8.0	1.3	900	70
S4	EU-02; Room B	25.0	2.5	12,500	70
S5	EU-02; Room B	25.0	2.5	12,500	70
S6	EU-02; Room B	25.0	2.5	12,500	70
S7	EU-02; Room B	25.0	2.5	12,500	70
S8	EU-02; Room B	25.0	2.5	12,500	70
S9	EU-02; Room B	25.0	2.5	12,500	70
S10	EU-02; Room B	25.0	2.5	12,500	70
S11	EU-02; Room B	25.0	2.5	12,500	70
S12	EU-02; Room B	25.0	2.5	12,500	70
S13	EU-02; Room B	25.0	2.5	12,500	70

### Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source and Permit Modifications be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 18, 2003. Additional information was received on March 28 and 31 and April 4, 14, 16 and 17, 2003.

### Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

<b>Pollutant</b>	<b>Potential To Emit (tons/year)</b>
PM	12.2
PM <sub>10</sub>	12.3
SO <sub>2</sub>	0.036
VOC	243
CO	5.07
NO <sub>x</sub>	6.04

<b>HAPs</b>	<b>Potential To Emit (tons/year)</b>
MEK	25.5
MIBK	18.2
Toluene	96.9
Xylenes	35.6
Chromium Compounds	0.244
Glycol Ethers	21.5
Ethylbenzene	20.8
HDI	0.001
Phosphorus	0.062
Methanol	0.929

HAPs	Potential To Emit (tons/year)
Methyl chloroform, Dichloromethane, Tetrachloroethylene or Trichlorotrifluoroethane	0.320
Benzene	0.0001
Dichlorobenzene	0.0001
Formaldehyde	0.005
Hexane	0.109
Lead	0.0003
Cadmium	0.0001
Manganese	0.00002
Nickel	0.0001
TOTAL	184

#### Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4)(D), "Any modification with a potential to emit greater than or equal to twenty-five (25) tons per year of volatile organic compounds (VOC)," and 326 IAC 2-7-10.5(f)(6), "Any modification with a potential to emit greater than or equal to ten (10) tons per year of a single hazardous air pollutant as defined under Section 112(b) of the CAA or twenty-five (25) tons per year of any combination of hazardous air pollutants." The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification (SPM 039-17397-00326) in accordance with 326 IAC 2-7-12(d)(1). The Significant Permit Modification will give the source approval to operate the proposed modification.

#### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	5.39
PM <sub>10</sub>	5.39
SO <sub>2</sub>	2.00
VOC	60.6
CO	2.00
NO <sub>x</sub>	3.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the limited potential to emit listing in the Technical Support Document for T 039-7512-00326, issued on December 31, 1998.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Proposed Modification (all significant emission units and some insignificant activities)	12.2	12.3	0.036	243	5.07	6.04	184

	<b>Potential to Emit</b> (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Existing emission units not included in the modification (some insignificant activities)	5.00	5.00	0.003	0.024	0.368	0.438	0.008
Total	17.2	17.3	0.039	243	5.43	6.48	184
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) The total source-wide potential to emit VOC is still less than 250 tons per year. Therefore, this source is still not a major source pursuant to 326 IAC 2-2.

#### **Federal Rule Applicability**

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold;
  - (2) that is subject to an emission limitation or standard; and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

- (1) This rule requires the source to:
  - (A) Submit a Part 1 MACT Application by May 15, 2002; and

- (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.
- (2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.
- (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
  - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
  - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
  - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

- (a) This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.



- (b) The total source-wide potential to emit VOC is still less than 250 tons per year. Therefore, this source is still not a major source pursuant to 326 IAC 2-2.

326 IAC 2-4.1-1 (New Source Toxics Control)

This is a modification to an existing major source of HAPs. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3(Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action:

Pursuant to 326 IAC 6-3-2(c), the PM from the painting operations at Plant 1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The two (2) prep areas, identified as Room A at each plant, do not have the potential to emit PM. Therefore, the prep areas are not subject to the requirements of 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes.
- (c) Pursuant to 326 IAC 6-3-2(d), particulate from the two (2) paint rooms, identified as Room B at each Plant, and the one (1) final finish room, identified as Room C at Plant 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential VOC emissions from the proposed modification are greater than 25 tons per year. Since there are no other 326 IAC 8 rules applicable to coating plastic parts, the requirements of 326 IAC 8-1-6 are applicable, and the source must install the best available control technology (BACT). Although Plant 1 can still comply with the existing BACT, BACT is re-evaluated for the total of all coating facilities at Plants 1 and 2 because the two (2) plants operate in series and are considered a single facility for the purposes of this rule.

The following control options were evaluated in a BACT analysis:

- (a) Condensation- Condensation systems are only effective for gas streams containing high concentrations of high molecular weight VOCs. The exhaust streams at this source contain low concentrations of relatively low molecular weight VOCs. In addition, the condensate would contain several chemicals and would not be suitable for reuse on site. Therefore, condensation is not technically feasible.

- (b) Chemical Scrubbers - In order for liquid absorption to be effective, the VOCs must be soluble in the same liquid. At this source, coatings often contain VOCs which are not soluble in the same liquid. Therefore, chemical scrubbers are not technically feasible.
- (c) Adsorption- Carbon adsorption is not technically feasible due to the threat of carbon bed fires. Zeolite adsorption is technically feasible for this source. The condensate from the waste streams would contain several chemicals, and it is not practicable to recover the solvents for reuse. Therefore, the only technologically feasible control option using adsorption is destroy the VOC with an oxidizer after zeolite adsorption (see Concentrator Treatment Systems below).
- (d) Incineration:
  - (1) Catalytic Incineration - Catalytic incineration is similar to thermal incineration, but uses a catalyst to lower the oxidation temperature, thus decreasing the fuel requirements. Catalytic incineration is technically feasible at this source. Thermal incineration was not included in the cost analysis because the annual natural gas costs are far greater than those for catalytic incineration, which would make the cost of control higher for thermal incineration than for catalytic incineration.
  - (2) Concentrator Treatment Systems - Concentrator systems combine the features of adsorption and incineration. This involves adsorbing the VOCs from a large volume air stream onto a bed of activated carbon, then desorbing the VOCs from the bed with a small volume of hot air. The smaller concentrated air stream is then incinerated. Zeolite concentrator treatment systems are technically feasible at this source.
- (e) Thermal Oxidation - A regenerative thermal oxidizer is a technically feasible control option for this source.
- (f) Biofiltration - Biofiltration is a land-intensive system in which contaminated air is fed under an active bed of soil containing microorganisms. As air rises through the soil, the microorganisms consume and convert the chemicals into carbon dioxide and water. This source does not have sufficient available land to use for the filter bed. Therefore, biofiltration is not technically feasible.

Additional control methods considered by the source are as follows:

- (a) Transfer Efficiency - High volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficiency than HVLP will be used to apply all coatings, including repair coatings, at this source. The exterior of the units are hand wiped with a cleaning solvent prior to coating.
- (b) High solids coating systems - The facility will use some materials that may be considered high-solids content coatings. Coatings with higher solvent contents would require a drying oven operating at temperatures above 195 degrees Fahrenheit to obtain the finish quality and production rate required. This is not technically feasible because the assembled recreational vehicles include some heat sensitive materials, such as tires, rubber tubing, and plastic parts. The applicant is proposing to use coatings with the following maximum VOC contents:

Primer: Primer A has a VOC content of 4.44 lbs VOC / gallon of coating, Primer B has a VOC content of 5.93 lbs VOC/ gallon of coating and Primer C has a VOC content of 3.65

lbs VOC / gallon of coating

base coat: 5.88 lbs VOC/ gallon of coating

clear coat: 4.80 lbs VOC/ gallon of coating

- (c) Waterborne coatings - Waterborne coatings are sometimes used to reduce VOC emissions from surface coating. The drying times of waterborne coatings is dependent on temperature and humidity. The drying time is longer than that of solvent based coatings, making waterborne coatings technically infeasible. Also, water borne coatings do not retain their gloss and color as well as the proposed formulations. In addition, a dryer cannot be added to this process because the assembled recreational vehicles include some heat sensitive materials, such as tires, rubber tubing, and plastic parts.
- (d) Non-photochemically reactive solvent substitutes - Many of the non-photochemically reactive solvents used in paint formulations cause other environmental problems, such as stratospheric ozone depletion. Therefore, they are not feasible options. The applicant will continue to explore the use of acetone in initial cleaning of the units to be painted.

The add-on control options evaluated in a cost analysis are catalytic incineration, concentrator treatment systems (zeolite concentrator with oxidizer) and regenerative thermal oxidation. Since the two (2) plants are separated, two (2) control devices would be required for the production line. The cost of add-on control methods, as determined by the cost analysis, ranged between \$6,339.80 per ton of VOC removed and \$32,486.86 per ton of VOC removed. The least expensive was adding a concentrator treatment system (zeolite adsorption with an oxidizer) (\$6,339.80 per ton). The applicant has indicated that these add-on control methods are economically not feasible for this source. In a review of BACT for similar sources in Indiana, the sources did not use add-on controls to comply with BACT. Also, the proposed MACT for this type of source states that there are no add-on controls used for the assembled on-road vehicle subcategory. The applicant will accept a VOC emission limit of 243 tons per year as part of BACT. This is equivalent to the proposed unrestricted potential to emit.

Therefore, BACT for these facilities (EU-01 and EU-02) has been determined to be as follows:

- (a) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC content of coatings used shall be limited as follows:
  - (1) primer: 6.1 lbs VOC/ gallon of coating
  - (2) base coat: 5.9 lbs VOC/ gallon of coating
  - (3) clear coat: 4.8 lbs VOC/ gallon of coating
- (c) The listed work practices as follows:
  - (1) All coatings will be applied using high volume, low pressure (HVLP) spray equipment or a spray applicator as efficient or more efficient than a HVLP spray applicator.

- (2) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.
- (3) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.
- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.
- (5) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.
- (6) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.
- (7) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.
- (8) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, which are spray coating operations, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, stacks (F1 through F4 and S3 through S13) while one or more of the coating processes is in operation. The Com-

pliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

- (a) Due to the agency's name change, all references to the Office of Air Management have been changed to the Office of Air Quality, and all references to OAM have been changed to OAQ.
- (b) The name of the source has been changed in all headers, on the cover page and on all forms, as follows:  
  
Carrera Designs, Inc., ~~Plant 4~~
- (c) The zip code for the source has been corrected on the cover page, in Section A.1, and on all forms, as follows:  
  
~~46514~~ **46516**
- (d) The type of source is clarified in Condition A.1 as follows:

#### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary custom ~~bus and bus skirt~~ **recreational vehicle** coating source.

Responsible Official:	John Bibbo
Source Address:	4201 Eastland Drive, Elkhart, Indiana <del>46514</del> <b>46516</b>
Mailing Address:	4201 Eastland Drive, Elkhart, Indiana <del>46514</del> <b>46516</b>
SIC Code:	3711
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program

Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

(e) All other changes are described previously, and are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

~~One (1) bus and bus skirt painting facility constructed in 1984 for color application (COA), clearcoat application (CLA), and paint preparation solvent application (PAP), equipped with eleven (11) high volume low pressure (HVLP) spray guns for color application, two (2) high volume low pressure (HVLP) spray guns for clearcoat application, three (3) high volume low pressure (HVLP) spray guns for repair work and hand application of the solvent at the paint preparation stage, with dry filters as overspray control, and exhausting through stacks F1 and F2, maximum capacity: 0.167 fiberglass buses or 0.250 bus skirts per hour, with maximum emissions resulting from coating 0.125 buses and 0.125 bus skirts per hour.~~

(a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:

- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
- (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control; and
- (4) One (1) paint mix room.

(b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:

- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;
- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
- (3) One (1) paint mix and storage area.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

One (1) bus and bus skirt painting facility constructed in 1984 for color application (COA), clearcoat application (CLA), and paint preparation solvent application (PAP), equipped with eleven (11) high volume low pressure (HVLP) spray guns for color application, two (2) high volume low pressure (HVLP) spray guns for clearcoat application, three (3) high volume low pressure (HVLP) spray guns for repair work and hand application of the solvent at the paint preparation stage, with dry filters as overspray control, and exhausting through stacks F1 and F2, maximum capacity: 0.167 fiberglass buses or 0.250 bus skirts per hour, with maximum emissions resulting from coating 0.125 buses and 0.125 bus skirts per hour.

(a) The following facilities at Plant 1, identified as EU-01, for coating recreational vehicle slide out panels, with a capacity of 10 recreational vehicles per day:

- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stack F5;
- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control and exhausting through stacks F1 through F4;
- (3) One (1) final finish room, identified as Room C, equipped with high volume, low pressure (HVLP) spray applicators for base coat and clear coat application as needed for repairs and a dry filter for overspray control; and
- (4) One (1) paint mix room.

(b) The following facilities at Plant 2, identified as EU-02, for coating the exterior of recreational vehicles, with a capacity of 10 recreational vehicles per day:

- (1) One (1) prep area, identified as Room A, using hand applicators and exhausting to stacks S1 and S2;
- (2) One (1) paint room, identified as Room B, for base coat and clear coat application, equipped with high volume, low pressure (HVLP) spray applicators and a dry filter for overspray control, and exhausting through stacks S3 through S13; and
- (3) One (1) paint mix and storage area.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)] [40 CFR 52 Subpart P]

Pursuant to 326 IAC 6-3-2(c) 40 CFR 52 Subpart P, the PM from the painting operations at Plant 1 including color application (COA), clearcoat application (CLA) and paint preparation solvent application (PAP); shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]**

~~(a) Pursuant to 326 IAC 8-1-6 (New facilities; General reduction requirements), the VOC delivered to the applicators, including clean-up solvents at the painting facility, including color application (COA), clearcoat application (CLA) and paint preparation solvent application (PAP), shall not exceed a total of 55.6 tons per twelve (12) consecutive months when coating fiberglass/ reinforced plastics. BACT for these facilities (EU-01 and EU-02) has been determined to be as follows:~~

**(a) The total VOC usage in coatings and cleanup solvents used at the surface coating facilities shall be limited to no more than 243 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

**(b) The VOC content of coatings used shall be limited as follows:**

- (1) primer: 6.1 lbs VOC/ gallon of coating**
- (2) base coat: 5.9 lbs VOC/ gallon of coating**
- (3) clear coat: 4.8 lbs VOC/ gallon of coating**

**(c)(b) The following best available control technology (BACT) workplace practices shall be implemented:**

- (1) All coatings will be applied with high volume, low pressure (HVLP) spray applicators or a spray applicator as efficient or more efficient than a high volume, low pressure spray applicator.**
- (2) The spray guns used shall be the type that can be cleaned without the need for spraying the solvent into the air.**
- (3) Cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures.**
- (4) Cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly.**
- (5) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete. The waste solvent shall be handled in such a manner that evaporation is minimized.**
- (6) Storage containers used to store VOC and/or HAP containing materials shall be kept covered when not in use.**
- (7) The application equipment operators shall be instructed and trained in the methods and practices utilized to minimize overspray emitted on the floor and into the air filters.**



**(8) Exteriors will be hand-wiped with a cleaning solvent prior to the application of the first coating.**

**D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this facility~~ **these facilities** and any control devices.

**Compliance Determination Requirements**

**~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]~~**

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM and VOC limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

**D.1.54 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]**

Compliance with the VOC **content and** usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**~~D.1.6 VOC Emissions~~**

~~Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) months.~~

**D.1.75 Particulate Matter (PM) [326 IAC 6-3-2(d)]**

**Pursuant to 326 IAC 6-3-2(d), The dry filters for PM overspray control shall be in operation at all times when the surface coating processes (COA and GLA) are in operation particulate from the two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1, shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.86 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the **two (2) paint rooms, identified as Room B at each plant, and the one (1) final finish room, identified as Room C at Plant 1,** painting facility stacks (F1 and F2 through F4 and S3 through S13) while one or more of the coating processes is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which

should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.97 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(6)~~**(5)** below. Records maintained for (1) through ~~(6)~~**(5)** shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC **content and** usage limits established in Conditions D.1.2.
- (1) ~~The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;~~ **The VOC content of each coating material and solvent used.**
- (2) **The amount of coating material and solvent used on monthly basis.**
- (A) **Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
- (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
- ~~(2) A log of the month of use;~~
- ~~(3) The volume weighted VOC content of the coatings used for each month;~~
- ~~(4)~~**(3)** The cleanup solvent usage for each month;
- ~~(5)~~**(4)** The total VOC usage for each day month; and
- ~~(6)~~**(5)** The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Conditions ~~D.1.7~~ **D.1.5** and ~~D.1.8~~ **D.1.6**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### **D.1.108 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

### Part 70 Quarterly Report

Source Name: Carrera Designs, Inc., ~~Plant 1~~  
Source Address: 4201 Eastland Drive, Elkhart, Indiana ~~46514~~ **46516**  
Mailing Address: 4201 Eastland Drive, Elkhart, Indiana ~~46514~~ **46516**  
Part 70 Permit No.: T039-7512-00326  
Facility: ~~Painting including color application (COA), clearcoat application (CLA) and paint preparation solvent application (PAP) Plants 1 and 2 (EU-01 and EU-02)~~  
Parameter: Total VOC usage ~~when painting fiberglass/ reinforced plastics~~  
Limit: **55.6 243** tons per twelve (12) consecutive months **period, with compliance determined at the end of each month**

YEAR: \_\_\_\_\_

Month	Column-1 VOC Usage (tons)	Column-2 VOC Usage (tons)	Column-1 + Column-2 VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total
<del>Month-1</del>			
<del>Month-2</del>			
<del>Month-3</del>			

The following has been added to the bottom of the report form:

**Attach a signed certification to complete this report.**

### Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 039-17227-00326, and the operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-17397-00326.

Appendix A: Emissions Calculations

VOC and Particulate

From Surface Coating Operations

Company Name: Carrera Designs, Inc.  
Address City IN Zip: 4201 Eastland Drive, Elkhart, IN 46516  
Significant Source Modification: 039-17227  
Significant Permit Modification: 039-17397  
PIT ID: 039-00326  
Reviewer: CarrieAnn Paukowits  
Date: February 18, 2003

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (lb/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lb/gal)	Transfer Efficiency	Material Substrate
<b>Plant 1</b>																	
<b>Room A - Stack F5</b>																	
<b>Paint Prep</b>																	
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.5%	20.0%	0.00%	0.22300	0.420	7.31	5.84	0.55	13.14	2.40	0.00	n/a	100%	Fiberglass Reinforced Plastics
<b>Rooms B and C - Stacks F1, F2, F3 &amp; F4</b>																	
Sealer (S64)	6.86	90.52%	53.0%	37.5%	55.1%	4.64%	0.18750	0.420	5.73	2.57	0.20	4.86	0.89	0.00	55.47	100%	Fiberglass Reinforced Plastics
<b>Basecoat</b>																	
Basecoat/White Toner	10.35	50.89%	0.0%	50.89%	0.0%	50.0%	0.27	0.420	5.27	5.27	0.60	14	2.6	0.6	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.55	0.420	7.31	5.84	1.34	32	5.9	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S White Basecoat	8.23	79.41%	10.74%	68.67%	13.4%	16.7%	0.82	0.420	6.52	5.65	1.9	47	8.5	0.6	n/a	75%	Fiberglass Reinforced Plastics
Basecoat/Metallic Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	0.46	0.420	5.92	5.92	1.15	28	5.0	0.4	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.46	0.420	7.31	5.84	1.13	27	5.0	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Metallic Basecoat	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	0.92	0.420	6.54	5.88	2.3	55	10.0	0.4	n/a	75%	Fiberglass Reinforced Plastics
<b>Tints</b>																	
Graphics/Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	0.29	0.420	5.92	5.92	0.72	17	3.1	0.3	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29	0.420	7.31	5.84	0.71	17	3.1	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Tint	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	0.58	0.420	6.54	5.88	1.4	34	6.2	0.3	n/a	75%	Fiberglass Reinforced Plastics
<b>Clearcoat</b>																	
Clearcoat (CC533)	7.88	49.37%	0.0%	49.37%	0.0%	40.4%	0.46	0.420	3.89	3.89	0.75	18	3.3	0.8	n/a	75%	Fiberglass Reinforced Plastics
Activator (Hardner) (MCR75)	7.20	95.83%	0.0%	95.83%	0.0%	5.0%	0.12	0.420	6.90	6.90	0.33	8	1.5	0.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.17	0.420	7.31	5.84	0.42	10	1.9	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Clearcoat	7.61	67.14%	4.02%	63.12%	4.6%	25.6%	0.75	0.420	5.04	4.80	1.5	36	6.6	0.9	n/a	75%	Fiberglass Reinforced Plastics
<b>Cleaners</b>																	
Safety-Kleen Heavy Duty (6782)	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	2.08600	0.250	7.01	7.01	3.66	87.74	16.01	0.00	n/a	100%	Fiberglass Reinforced Plastics
Clearcoat Gun Cleaner (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29600	0.250	7.31	5.84	0.44	10.45	1.91	0.00	n/a	100%	Fiberglass Reinforced Plastics
<b>Plant 2</b>																	
<b>Room A - Stacks S1 &amp; S2</b>																	
<b>Paint Prep</b>																	
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	1.26540	0.420	7.31	5.84	3.11	74.54	13.60	0.00	n/a	100%	Fiberglass Reinforced Plastics
<b>Primer</b>																	
Primer (P50)	13.53	28.23%	0.0%	28.23%	0.0%	42.1%	0.33	0.420	3.82	3.82	0.53	13	2.3	0.0	n/a	100%	Fiberglass Reinforced Plastics
Reducer (AS3)	7.08	99.58%	0.0%	99.58%	0.0%	0.5%	0.08	0.420	7.03	7.03	0.25	6	1.1	0.0	n/a	100%	Fiberglass Reinforced Plastics
Hardener (JH200)	8.25	52.85%	0.0%	52.85%	0.0%	45.0%	0.08	0.420	4.36	4.36	0.15	4	0.7	0.0	n/a	100%	Fiberglass Reinforced Plastics
R-T-S Primer A	11.57	38.41%	0.00%	38.41%	0.0%	35.7%	0.50	0.420	4.44	4.44	0.9	22	4.1	0.0	n/a	100%	Fiberglass Reinforced Plastics
Etching (E23980)	8.94	61.20%	0.0%	61.20%	0.0%	21.5%	0.25	0.420	5.41	5.41	0.57	14	2.5	0.0	n/a	100%	Fiberglass Reinforced Plastics
Reducer (R7K981)	6.76	97.49%	2.0%	95.49%	1.6%	0.5%	0.25	0.420	6.56	6.46	0.68	16	3.0	0.0	n/a	100%	Fiberglass Reinforced Plastics
R-T-S Primer B	7.80	76.93%	0.87%	76.06%	0.8%	11.0%	0.50	0.420	5.98	5.93	1.2	30	5.5	0.0	n/a	100%	Fiberglass Reinforced Plastics
Primer C (CS105/S59) - can be used with B	11.24	32.47%	0.0%	32.5%	0.0%	31.00%	0.12500	0.420	3.65	3.65	0.19	4.60	0.84	0.00	11.77	100%	Fiberglass Reinforced Plastics
<b>Room B - Stacks S3 through S13</b>																	
Sealer (S64)	6.86	90.52%	53.0%	37.5%	55.1%	4.64%	0.81250	0.420	5.73	2.57	0.88	21.08	3.85	0.00	55.47	100%	Fiberglass Reinforced Plastics
<b>Basecoat</b>																	
Basecoat/White Toner	10.35	50.89%	0.0%	50.89%	0.0%	50.0%	1.73	0.420	5.27	5.27	3.82	92	16.7	4.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	3.45	0.420	7.31	5.84	8.48	204	37.1	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S White Basecoat	8.23	79.41%	10.74%	68.67%	13.4%	16.7%	5.18	0.420	6.52	5.65	12.3	295	53.9	4.0	n/a	75%	Fiberglass Reinforced Plastics
Basecoat/Metallic Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	3.54	0.420	5.92	5.92	8.80	211	38.5	3.2	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	3.54	0.420	7.31	5.84	8.69	208	38.0	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Metallic Basecoat	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	7.08	0.420	6.54	5.88	17.5	420	76.6	3.2	n/a	75%	Fiberglass Reinforced Plastics
<b>Tints</b>																	
Graphics/Toner	7.91	74.83%	0.0%	74.83%	0.0%	50.0%	2.21	0.420	5.92	5.92	5.50	132	24.1	2.0	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	2.21	0.420	7.31	5.84	5.43	130	23.8	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Tint	7.54	86.80%	8.79%	78.01%	10.0%	25.0%	4.42	0.420	6.54	5.88	10.9	262	47.9	2.0	n/a	75%	Fiberglass Reinforced Plastics
<b>Clearcoat</b>																	
Clearcoat (CC533)	7.88	49.37%	0.0%	49.37%	0.0%	40.4%	2.31	0.420	3.89	3.89	3.77	90	16.5	4.2	n/a	75%	Fiberglass Reinforced Plastics
Activator (Hardner) (MCR75)	7.20	95.83%	0.0%	95.83%	0.0%	5.0%	0.58	0.420	6.90	6.90	1.67	40	7.3	0.1	n/a	75%	Fiberglass Reinforced Plastics
Reducer (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.87	0.420	7.31	5.84	2.12	51	9.3	0.0	n/a	75%	Fiberglass Reinforced Plastics
R-T-S Clearcoat	7.61	67.14%	4.02%	63.12%	4.6%	26.6%	3.75	0.420	5.04	4.80	7.6	182	33.1	4.3	n/a	75%	Fiberglass Reinforced Plastics
<b>Cleaners</b>																	
Safety-Kleen Heavy Duty (6782)	7.01	100.00%	0.0%	100.0%	0.0%	0.00%	2.08600	0.250	7.01	7.01	3.66	87.74	16.01	0.00	n/a	100%	Fiberglass Reinforced Plastics
Clearcoat Gun Cleaner (4-RW6000)	7.17	100.00%	18.5%	81.51%	20.0%	0.0%	0.29600	0.250	7.31	5.84	0.44	10.45	1.91	0.00	n/a	100%	Fiberglass Reinforced Plastics
<b>State Potential Emissions</b>											<b>TOTALS:</b>						
											<b>Control Efficiency:</b>						
											<b>Potential after Control:</b>						
											<b>55.5</b>						
											<b>1333</b>						
											<b>243</b>						
											<b>12.1</b>						
											<b>99.84%</b>						
											<b>0.019</b>						

Note: The number listed under weight % water and volume % water is actually the weight % acetone and volume % acetone, which is not a VOC, for all maerial except Reducer R7K981, which contains water.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* (876

## METHODOLOGY

HAR Contents for Basecoat/Toners

Stone White Basecoat	Weight % in Formula	Weight % Ethanolamine	Weight % Glycol Ethere	Weight % MEK	Weight % Glycol Ethere	Weight % Ethanolamine in Formula	Weight % Glycol Ethere in Formula	Weight % MEK in Formula	Weight % Glycol Ethere in Formula
U029	65.02%	0.00%	3.00%	18.00%	3.00%	0.00%	0.00%	0.00%	1.95%
U028	63.11%	3.00%	4.00%	25.00%	0.00%	0.99%	1.32%	8.20%	0.00%
U040	0.86%	10.00%	0.00%	0.00%	3.00%	0.00%	0.20%	0.00%	0.00%
U036	0.78%	4.00%	6.00%	33.00%	0.00%	0.03%	0.05%	0.26%	0.00%
U038	1.33%	5.00%	7.00%	37.00%	0.00%	0.01%	0.01%	0.05%	0.01%
U081	0.07%	0.00%	6.00%	36.00%	0.00%	0.00%	0.03%	0.00%	0.00%
Total	100%	0.00%	6.00%	36.00%	0.00%	1.12%	3.38%	19.28%	1.95%

  

Metallic Basecoat/ Graphics Toner	Weight % in Formula	Weight % Ethanolamine	Weight % Glycol Ethere	Weight % Glycol Ethere	Weight % Ethanolamine in Formula	Weight % Glycol Ethere in Formula	Weight % Glycol Ethere in Formula
U024	84.34%	0.00%	5.00%	29.00%	0.00%	4.22%	3.48%
U033	0.86%	3.00%	6.00%	37.00%	0.00%	0.27%	0.39%
U071	4.35%	1.00%	3.00%	17.00%	0.00%	0.48%	0.73%
U022	1.18%	0.00%	6.00%	35.00%	1.00%	0.08%	0.48%
U118	1.36%	2.00%	7.00%	38.00%	0.00%	0.02%	0.08%
Total	100%	0.00%	0.00%	0.00%	0.00%	4.61%	4.61%

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
Insignificant Emission Units**

Page 3 of 4 TSD App A

**Company Name: Carrera Designs, Inc.  
Address City IN Zip: 4201 Eastland Drive, Elkhart, IN 46516  
Significant Source Modification: 039-17227  
Significant Permit Modification: 039-17397  
Plt ID: 039-00326  
Reviewer: CarrieAnn Paukowits  
Date: February 18, 2003**

**New Proposed Units**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

13.78

120.71

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in lbs/hr	0.026	0.105	0.008	1.378	0.076	1.158
Potential Emission in tons/yr	0.115	0.459	0.036	6.04	0.332	5.07

**Existing Unit**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.00

8.76

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in lbs/hr	0.002	0.008	0.001	0.100	0.006	0.084
Potential Emission in tons/yr	0.008	0.033	0.003	0.438	0.024	0.368

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 4 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions  
Insignificant Emission Units**

Page 4 of 4 TSD App A

**Company Name: Carrera Designs, Inc.  
Address City IN Zip: 4201 Eastland Drive, Elkhart, IN 46516  
Significant Source Modification: 039-17227  
Significant Permit Modification: 039-17397  
Plt ID: 039-00326  
Reviewer: CarrieAnn Paukowits  
Date: February 18, 2003**

**New Units**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in lbs/hr	2.89E-05	1.65E-05	1.03E-03	2.48E-02	4.69E-05
Potential Emission in tons/yr	0.0001	0.0001	0.0045	0.1086	0.0002

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total HAPs
Potential Emission in lbs/hr	6.89E-06	1.52E-05	1.93E-05	5.24E-06	2.89E-05	0.026
Potential Emission in tons/yr	0.00003	0.0001	0.0001	0.00002	0.0001	0.114

**Existing Unit**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.0021	Dichlorobenzene 0.0012	Formaldehyde 0.0750	Hexane 1.8000	Toluene 0.0034
Potential Emission in lbs/hr	2.10E-06	1.20E-06	7.50E-05	1.80E-03	3.40E-06
Potential Emission in tons/yr	0.00001	0.00001	0.0003	0.008	0.00001

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.0011	Chromium 0.0014	Manganese 0.00038	Nickel 0.0021	Total HAPs
Potential Emission in lbs/hr	5.00E-07	1.10E-06	1.40E-06	3.80E-07	2.10E-06	0.002
Potential Emission in tons/yr	0.000002	0.000005	0.000006	0.000002	0.000009	0.008

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

## BACT Cost Analysis

Facility Name: Carrera Designs, Inc.  
 Location: 4201 Eastland Drive, Elkhart, Indiana 46516  
 Source Modification No.: 039-17227  
 Permit Modification No.: 039-17397  
 Permit Reviewer: CarrieAnn Paukowits/ MES  
 Total for two (2) control devices, one at each plant of the production line.

### Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Catalytic Incinerator	2,196,437	658,931	680,895	\$3,536,263
Regenerative Thermal Oxidizers	3,918,317	910,824	941,185	\$5,770,326
Zeolite Adsorbers with Regenerative Thermal Oxidizers	2,929,720	878,916	908,214	\$4,716,850

### Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Catalytic Incinerator	5,915,717	262,414	533,654	\$6,711,785
Regenerative Thermal Oxidizers	2,328,651	315,420	1,084,256	\$3,728,327
Zeolite Adsorbers with Regenerative Thermal Oxidizers	616,962	unknown	769,553	\$1,386,515

### Evaluation

Option	Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	\$/ton removed
Catalytic Incinerator	243	206.6	85	\$32,486.86
Regenerative Thermal Oxidizers	243	230.9	95	\$16,146.93
Zeolite Adsorbers with Regenerative Thermal Oxidizers	243	218.7	90	\$6,339.80

#### Methodology:

Emissions removed = (potential emissions)\*(control efficiency)  
 \$/ton removed = total annual cost/emissions removed

The cost breakdown is as follows:



**1. Capital Cost**

- a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
- b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
- c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

**2. Annual Cost**

- a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
- b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 yrs life of the system and 5 yrs life of carbon at 7% interest rate).